

Exhibit 2

Page 1

Case No.
20-cv-06570-TSH

CERTIFIED COPY

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19 REPORTED BY:

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12:55:19 1 you recall if that was called a "Go Back Letter"? Does
12:55:22 2 that ring any bells?
12:55:24 3 A. Absolutely no idea. She didn't --
12:55:26 4 Q. Okay.
12:55:26 5 A. -- read anything or tell me. She just said
12:55:28 6 "Here, I wrote you something; go home and have someone
12:55:32 7 help you fill it out."
12:55:35 8 Q. Did you ever access the Go Back Letter
12:55:38 9 yourself?
12:55:42 10 A. What do you mean by access it myself?
12:55:45 11 Q. Yeah. So going back to what we talked about
12:55:47 12 earlier. So what I want to know, basically, is have
12:55:50 13 you -- was there any point that you took steps to figure
12:55:53 14 out what the Go Back Letter said? Did you load it in to
12:55:56 15 your screen access software and review it?
12:55:59 16 A. I got it.
12:56:03 17 I ended up using my husband as my --
12:56:12 18 MR. ELIA: Okay -- objection; calls for
12:56:14 19 communications that are privileged.
12:56:23 20 So don't answer.
12:56:28 21 THE WITNESS: Okay.
12:56:31 22 Ooo, does that mean I can say "I plead the
12:56:34 23 Fifth"?
12:56:35 24 MR. FINE: Q. So I don't want to know
12:56:36 25 about your communications with your husband.

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12:56:37 1 A. Okay.

12:56:38 2 Q. But if you could just answer my question,

12:56:40 3 then -- well -- no, I guess it's really irrelevant.

12:56:52 4 I don't want to know about the contents of

12:56:53 5 your communications with your husband. But is it fair

12:56:56 6 to say that at some point you became aware of the

12:56:58 7 contents of the Go Back Letter?

12:57:02 8 A. Yes.

12:57:04 9 Q. And that's specifically referring to the

12:57:07 10 letter that Laura provided you on March 29, 2019, in the

12:57:10 11 CRO; is that correct?

12:57:15 12 A. I'm sorry. A very loud truck just ran by.

12:57:19 13 Can you repeat your question?

12:57:21 14 Q. Not a problem.

12:57:22 15 And that's referring specifically to the

12:57:25 16 letter that Laura provided you on March 29, 2019, in the

12:57:29 17 CRO; is that correct?

12:57:34 18 A. And you're asking if that letter made me aware

12:57:38 19 of what I needed to do?

12:57:39 20 Q. No.

12:57:40 21 So in my prior question I referenced the Go

12:57:42 22 Back Letter, and I just --

12:57:43 23 A. Yes.

12:57:43 24 Q. -- right. And you said that at some point you

12:57:46 25 became aware of the contents of that letter.

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CERTIFICATE OF REPORTER

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3 **I, DEBRA J. SKAGGS, hereby certify that the**
4 **witness in the foregoing deposition was by me remotely**
5 **duly sworn to tell the truth, the whole truth, and**
6 **nothing but the truth in the within-entitled cause;**

7

8 **That said deposition was taken in shorthand by**
9 **me, a Certified Shorthand Reporter of the State of**
10 **California, and was thereafter transcribed into**
11 **typewriting, and that the foregoing transcript**
12 **constitutes a full, true, and correct report of said**
13 **deposition and of the proceedings which took place;**

14

15 **That I am a disinterested person to the said**
16 **action.**

17

18 **IN WITNESS WHEREOF, I have hereunto set my**
19 **hand this 11th day of April, 2022.**

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DEBRA J. SKAGGS, CSR No. 7857

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